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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,  
LINDSAY ELIZABETH, and HEATHER  
HENDER, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
REVISED LITIGATION DEADLINES**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel, hereby present the following stipulated and agreed-upon revised litigation deadlines and request that the Court enter an order regarding the same. The Parties have a good faith basis for submitting this request, which extends the remaining litigation deadlines by three weeks to account for the date Plaintiffs submitted to Nike a corrected report for one of their experts and several related corrected backup data files. This request is not brought for purposes of delay and will not result in any prejudice to the Parties or to the Court.

### **STIPULATED REVISED LITIGATION DEADLINES**

The Parties hereby stipulate and agree and request the Court order the following revised litigation deadlines (the prior dates are provided in the first column for ease of reference):

<b>Litigation Deadline</b>	<b>Previous Deadline</b>	<b>Proposed New Deadline</b>
Nike to conduct expert discovery	7/16/21-9/9/21	8/6/21-9/30/21
Nike’s Expert Reports Due	9/10/21	10/1/21
Plaintiffs to conduct expert discovery	9/11/21-11/4/21	10/2/21-11/25/21
Plaintiffs’ Expert Reply Reports Due	11/5/21	11/29/21
Motion for Class Certification	12/17/21	1/10/22
Opposition to Class Certification	3/4/22	3/25/22
Reply to Class Certification	4/18/22	5/9/22

### **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD**

Dated: August 9, 2021

/s/ James Kan

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Attorneys for Plaintiffs, Opt-In Plaintiffs, and the  
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Dated: August 9, 2021

/s/ Felicia A. Davis

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**SIGNATURE ATTESTATION**

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: August 9, 2021

Respectfully submitted,

PAUL HASTINGS LLP

/s/ Felicia A. Davis  
Felicia A. Davis (*pro hac vice*)

**[PROPOSED] ORDER**

The Court has reviewed the Parties' Joint Stipulation Regarding Revised Litigation Deadlines and hereby enters the same as reflected below.

<b>Litigation Deadline</b>	<b>Revised Date</b>
Nike to conduct expert discovery	8/6/21-9/30/21
Nike's Expert Reports Due	10/1/21
Plaintiffs to conduct expert discovery	10/2/21-11/25/21
Plaintiffs' Expert Reply Reports Due	11/29/21
Motion for Class Certification	1/10/22
Opposition to Class Certification	3/25/22
Reply to Class Certification	5/9/22

**IT IS SO ORDERED.**

Dated:

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HON. JOLIE A. RUSSO  
United States Magistrate Judge